

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

SYNQOR, INC.

Plaintiff,

v.

CISCO SYSTEMS, INC.

Defendant.

Civ. No. 2:14-CV-286-MHS-CMC

**JURY TRIAL DEMANDED**

**JOINT STIPULATION REGARDING SCOPE OF DR. LEEB’S TESTIMONY WITH  
RESPECT TO THE VICOR PARTS**

IT IS HEREBY STIPULATED AND AGREED, by Defendant Cisco Systems, Inc. (“Cisco”) and Plaintiff SynQor, Inc. (“SynQor”) that:

1. SynQor’s technical expert, Dr. Steven B. Leeb, has submitted a single Rebuttal Expert Report regarding infringement in both the above-captioned case and in case no. 2:14-cv-00287, *SynQor, Inc. v. Vicor Corporation*.
2. SynQor’s infringement allegations against Cisco include allegations that Cisco’s incorporation of certain accused Vicor intermediate bus converters into certain Cisco end products constitutes infringement of the patents-in-suit.
3. Vicor has filed a “Motion To Exclude New Opinions In The ‘Rebuttal’ Expert Report Of Steven Leeb” in case no. 2:14-cv-00287 (Dkt. No. 66, filed on May 29, 2014).
4. The opinions of Dr. Leeb that Vicor seeks to exclude are offered against both Vicor and Cisco.

5. Cisco notified SynQor of its intent to file a motion in the above-captioned case seeking to strike the same portions of Dr. Leeb's Rebuttal report for the same reasons as those set forth in Vicor's filings.

6. To avoid unnecessary briefing and unduly burdening the Court, the parties hereby agree that Cisco will be deemed to have joined and adopted Vicor's filings, and the parties agree to be mutually bound by the Court's decision on Vicor's motion (Dkt. No. 66) in the '287 case.

7. More specifically, if the Court in the '287 case limits Dr. Leeb's testimony in response to Vicor's motion, then SynQor agrees that his testimony would be similarly limited with respect to the Vicor parts at issue in this case without the need for Cisco to file a separate motion.

8. Conversely, if the Court in the '287 case denies Vicor's motion, then Cisco agrees that it will not seek to limit Dr. Leeb's testimony with respect to the Vicor parts at issue in this case for any of the reasons raised in Vicor's motion.

Dated: June 10, 2014

*/s/ David T. DeZern, with permission by  
Michael E. Jones*

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Dated: June 10, 2014

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**ATTORNEYS FOR  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3) on June 10, 2014.

/s/ Michael E. Jones